

IN THE UNITED STATES DISTRICT COURT
FOR THE Western DISTRICT OF Tacoma,
Washington DIVISION

(Write the District and Division, if any, of
the court in which the complaint is filed.)

MAR 04 2016

Tim Kittleson

RVHK (CPS Change name RVHK: (Unknown), TM
Jr. HK (CPS Change name for TM Jr. H K: E J F), M
J HK (CPS Change name for MJHK: L B F) C M H
K (CPS Change name CMHK: (Unknown), A J H K

(Write the full name of each plaintiff who is filing
this complaint. If the names of all the plaintiffs
cannot fit in the space above, please write "see
attached" in the space and attach an additional
page with the full list of names.)

-against-

The State of WA _____

CPS/DCFS/DHSH all departments Tumwater
Thurston County, SW's Denise Johnson, Joel Pettit,
Alison Mielke, Jennifer Dunlop, SW Supervisor Kim
Grabrett, SW's Lyndsey Rutt, Kelly Hogan, SW
Supervisor Mandy Huber, Visit supervisors Emilee
Path, Suzanne Hashem, Heather Mc Phearson SW
SSHS, Dr. O' Leary, Foster Mom Sara Crabb, Foster
Mom Susan (Unknown Last name), Visit supervisors
Brittney Ann Beasley, Jennifer Lee, Parent Coaches
Brenda Sullens, Tina Sien Sandiego, Steve Harding
Counselor, Jody Smetak Counselor, John Castele
Counselor, Casa's Dan Brunner, Rachel Pope
Everett Family Juvenile Court House Judge Greg N
Boulder, Judge Jonathan Lack Rhara J. Delarine #
21490, Gwen Forrest Reider WSBA# 38956, Ann
Margaret Brice attorney Bar# 23059, Martin Hudges
Attorney #201818, Gene Russell CASA, Lynn

**Complaint for Violation of Civil
Rights**

(Non-Prisoner Complaint)

Case No. _____

(to be filled in by the Clerk's Office)

Jury Trial: ☐ Yes ☐ No
(check one)

CV 16 5178 RBE

Lichtenberg Attorney, Richard Stapp, Kirston, Haugen CASA, Robert Boovart Br# 17630, Jay Carey attorney

Olympia/Tumwater Family Juvenile Court House for the State of WA Judge Ann Hersh or Hival, Judge Wickham, Jason Kinn, Judge Christine Poumlroy, Dan Brunner CASA, Judge Wilson, _ Jacob Phillips WSBA # 43902, OID # 91021, Ashley Pope CASA, Norman Kortokrex Bar# 38555

District or Superior Court house State of WA, Judge Wickham, Judge Christine Polmoroy, Judge Wilson Everett Snohomish County CPS, DCFS, DSHS all departments, Zee Triplett, Vanessa Stillwell, Lyndsey Rutt, Mary Bell, Rachel Nonfito, and Sue Hefonv, Dr. Foulder Colby

Edmonds Stevens Hospital (change name to Swedish Medical) ER RN Females, Nurse male, Edmonds EMT's Two males, Providence Hospital, Tacoma General Hospital

Steve Harding Counselor, John Castelee Counselor

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in *forma pauperis*.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Tim Kittleson, AJHK (RVHK, TMJR.HK (E J F), MJHK (L B F), CMHK Unknown address)
Street Address	1523 Lilly Rd N E # 2 _____
City and County	Olympia, Thurston _____
State and Zip Code	WA 98506 _____
Telephone Number	360-972-9122(Unknown to RV, TM Jr. (E J F), MJ (L B F), and CM)
E-mail Address	miraclerv@gmail.com _____

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name State of WA _____
 Job or Title Department of Enterprise Office and risk management _____ (if known)
 Street Address 1500 Jefferson St SE 41466
 City and County Olympia, Thurston
 State and Zip Code WA, 98504-1466
 Telephone Number Fax: 360-407-8022
 E-mail Address _____
 (if known)
☐ Individual capacity ☐ Official capacity

Defendant No. 2

Name CPS/DCFS/DHSH all departments, Denise Johnson, Joel Pettit, *Alison Mielke*, Jennifer Dunlop, Kim Grabrett, Lyndsey Rutt, Kelly Hogan, Mandy Huber, Emilee Path, Suzanne Hashem, Heather Mc Phearson SW SSHS, Dr. O' Leary, FM Sara Crabb, FM Susan (Unknown Last name), Brittney Ann Beasley, Brenda Sullens PC, Jennifer Lee, Steve Harding, John Castele _____
 Job or Title CPS Social Worker, KB, MH SW Supervisor, EP, SH, HMCP, JL visit supervisor (pick up & Drop off kids), DR O Physiological DR, SC Foster Home, Susan Foster Home for CMHK, AJHK - Tumwater for RVHK, TMJR.HK, MJHK, HP SW SSHS, BAB Supervisor Visits, Parent Coach BS, TS Parent Coach, _ (if known)
 Street Address 6860 Capitol Blvd Building 2 _____
 Mail Stop MS N31-10 _____ P O Box 41050 _____
 City and County Tumwater, Thurston

 State and Zip Code WA, 98501, 98504 (PO Box)
 Telephone Number (360) 902-8400
 E-mail Address _____
 (if known)
☐ Individual capacity ☐ Official capacity

Defendant No. 3

Name Everett Snohomish County CPS, DCFS, DHSH all departments, Zee Triplett, Vanessa Stillwell, Lyndsey Rutt, Mary Bell,

Rachel Nonfito, and Sue Hefonv

Job or Title SW, RN SW Supervisor _____ (if known)

Street Address 840 N. Broadway Building a Suite 340

City and County Everett, Snohomish

State and Zip Code WA, 98201

Telephone Number (425) 339-4768

E-mail Address _____

(if known)

☐ Individual capacity

☐ Official capacity

Defendant No. 4

Name Steve Harding

Job or Title Counselor therapist _____ (if known)

Street Address 204 Quince St NE Suite 103

City and County Olympia/Thurston

State and Zip Code WA, 98506

Telephone Number (360) 584-5879

E-mail Address _____

(if known)

☐ Individual capacity

☐ Official capacity

Defendant No. 5

Name Dr. Michael O' Leary

Job or Title Phycologist DR. _____ (if known)

Street Address 3377 Bethel RD SE Suite 107

City and County Port Orchard

State and Zip Code WA, 98366

Telephone Number Unknown

E-mail Address _____

(if known)

☐ Individual capacity

☐ Official capacity

Defendant No. 6

Name Dr. Foulder Colby

Job or Title Psychologist Dr. _____ (if known)
Street Address P O Box 439
City and County Clinton
State and Zip Code WA, 98236
Telephone Number (866) 290-6965
E-mail Address _____
(if known)
☐ Individual capacity ☐ Official capacity

Defendant No. 7

Name Jody Smetak
Job or Title Counselor Therapist _____ (if known)
Street Address 46 Lee St SE STE C
City and County Tumwater, Thurston
State and Zip Code WA 98501
Telephone Number 360-970-1393
E-mail Address _____
(if known)
☐ Individual capacity ☐ Official capacity

Defendant No. 8

Name Joel Pettit
Job or Title Old SW CPS Sate-WA, Used to be Police Officer
Nisqually Tribe, Current last known Fireman either in Nisqually –
Olympia SE side or Tumwater _____ (if known)
Street Address Last Known Residents; 1008 Deelbrush Dr SE
City and County Olympia, Thurston or Pierce if work their _____
State and Zip Code WA, 98513 _____
Telephone Number _____
E-mail Address _____
(if known)
☐ Individual capacity ☐ Official capacity

Defendant No. 8

Name Family Juvenile Court House for the State of WA,
 Judge Ann Hersh or Hival, Judge Wickham, Jason Kinn, Judge Christine
 Pumlroy, Dan Brunner CASA, Judge Wilson, _ Jacob Phillips WSBA #
 43902, OID # 91021, Ashley Pope CASA, Norman Kortokrex Bar# 38555

Job or Title All Judges on our case, DB CASA for all five kids,
 JK CPS State of WA on all five cases, JP CPS Attorney state of WA on
 CMHK, AJHK cases, AP Casa Supervisor (all 5 Kids), AP CASA (After
 Dan left for CMHK, AJHK), NK CPS Attorney (if known)

Street Address 2801 32nd Ave SW (Finish Term Trail 3 older boys
 Judge Wickham, Judge Pomlroy)

City and County Tumwater, Thurston (Heard JK Attorney works in
 Mason County)

State and Zip Code WA, 98501

Telephone Number (360) 709-3201

E-mail Address _____
 (if known)

☐ Individual capacity ☐ Official capacity

Defendant No. 9

Name District or Superior Court house State of WA, Judge
 Wickham, Judge Christine Polmoroy, Judge Wilson

Job or Title Judges or Commissures _____ (if known)

Street Address 2000 Lakeridge Dr SW #3
 (This address we had for the term trails)

City and County Olympia, Thurston

State and Zip Code WA, 98502

Telephone Number (360) 786-5450

E-mail Address _____
 (if known)

☐ Individual capacity ☐ Official capacity

Defendant No. 10

Name Everett Family Juvenile Court House, All judges,
 Judge Greg N Boulder, Judge Jonathan Lack Rhara J. Delarine # 21490,
 Gwen Forrest Reider WSBA# 38956, Ann Margaret Brice Bar# 23059,
 Martin Hudges Attorney #201818, Gene Russell CASA, Lynn Lichtenberg

Attorney, Richard Stapp, Kirston, Haugen CASA, Robert Boovart Br#
17630, Jay Carey _____

Job or Title AB was cps attorney, MH, GR, LL, RS, RB attorney for
cps state of WA _____ (if known)

Street Address 3000 Rockefeller Ave #502

City and County Everett, Snohomish

State and Zip Code WA, 98201

Telephone Number 425) 388-3421

E-mail Address _____

(if known)

☐ Individual capacity ☐ Official capacity

Defendant No. 11

Name John Castelee

Job or Title Counselor therapist _____ (if known)

Street Address 8833 Pacific Ave

City and County Tacoma/Pierce

State and Zip Code WA, 98444

Telephone Number 253-538-0916

E-mail Address _____

(if known)

☐ Individual capacity ☐ Official capacity

Defendant No. 12

Name Stevens Hospital change name to Swedish Medical
ER, RN, Nurse (Known Names)

Job or Title ER RN, CNA _____ (if known)

Street Address 21601 76th Ave. W.

City and County Edmonds/King

State and Zip Code WA 985026

Telephone Number 425-640-4000

E-mail Address _____

(if known)

☐ Individual capacity ☐ Official capacity

Defendant No. 13

Name EMT's Edmonds WA (Unknown Name)
 Job or Title EMT _____ (if known)
 Street Address (Unknown)
 City and County Edmonds
 State and Zip Code WA 985
 Telephone Number 911 / Unknown
 E-mail Address _____
 (if known)
☐ Individual capacity ☐ Official capacity

Defendant No. 14

Name Providence Hospital ER Maternity section, Imaging
 Ultrasound, Dr. (Known Names)
 Job or Title RN, CNA _____ (if known)
 Street Address 413 Lilly Road N.E.
 City and County Lacey, Thurston
 State and Zip Code WA 98506
 Telephone Number (360) 491-9480
 E-mail Address _____
 (if known)
☐ Individual capacity ☐ Official capacity

Defendant No. 15

Name Tacoma General Hospital ER, maternity section
 females RN, Female Nurses (Unknown names)
 Job or Title RN's, CNA _____ (if known)
 Street Address 46 Lee St SE STE C
 City and County Tumwater, Thurston
 State and Zip Code WA 98501
 Telephone Number (253) 434-1000
 E-mail Address _____
 (if known)

☐ Individual capacity ☐ Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue the state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (*check all that apply*):

- ☐ Federal officials (a *Bivens* claim)
☐ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials? Yes’

Add’ l damages pursuant to such false statements to undermine my ability to have the children returned. Fabrication of evidence, and or continual false statements that were made by the defendants since date listed. Furthermore, was encompassing discrimination, defamatory, of the 14th amendment, and libel, as moreover, my children and myself have been suffering ever since the state defendants have unlawfully, and or unconstitutionally, unwarranted, and remove my children conspired act, to deprive, failure to reunite, submission of perjury, 4th amendment, 1st and various other tort-related and federal suit claim(s) for which, are associated with the injured parties suit, to be filed accordingly, and timely against the liable defendants. My children and I have severely injured.

Suing for the familial association of violation. The right to such companionship. The intent to deprive, continual federal violation, and the state gross negligent act(s), negligence, failure to train its employees, suing for submitting at each hearing, and or through the sworn-in affidavit(s) false information, recklessly per defendant, and or knowingly, with an intent to cause me, the injured claimant harm, so my children is never to be returned to my primary loving care. Furthermore, and have the state of WA change my children full identity back to their original full family birth status on their birth certificate and Social Security card.

Suing for the fourth amendment violation, involving unlawful seizure, sexual abuse of the minor, my child _CMHK, and while being away from my care for physical and emotional harm to my children CMHK, RVHK, TMJR.HK, MJHK, AJHK a minor, at time of file, along with suing for damages for the deprivation, et.al, specifically the Injured claim’s fourteenth amendment, The United States Fourteenth Amendment of the

well-established, Due Process-Clause et.al., along with a multitude of other valid claims; against all defendants, relating to my, in writing, my timely notice of intent to sue, for damages, now served, against per defendants, listed in my lawsuit notice of my intent, for the destruction and for separation of father and child.

The force-separation has caused me, and my five children pain **continued** suffering and is in violation of my state-federal constitutional right. Such rights of the parent are not in any way unclear, as supported by case law, throughout our nation, and state.

I have been injured and emotionally abuse. Since my children were removed, they have suffered either sexual abuse & or physical, psychological, emotional abuse, neglect, medical harm, spiritual abuse while caseworkers were conspiring to keep them from my safe, loving primary care, in violation of my rights.

We just found out from CMHK termination hearing; SW Joel Pettit testify on 3/4/2015, and SW Dennis Johnson testify on 3/24/2015. Both these SW's testified in court and said "The head department of the state of WA that is over cps has said they have put all the HK kids up for adoption, ever since they got taken away. There was no plan for returning the kids back to the parents. Even AJHK was not supposed to return home to the parents either."

Dan Brunner testified to HK Parents outside the courthouse before CMHK Termination trail and said "What I am testifying today is only so, I can WIN a case. I never have one a case since I started working in the CASA program because I was against the CPS State of WA because like other families like yours in the boys Term Trail I lost the case for sticking up for good parents like yourself. I am only going to say to the judge just so; I can WIN at least one case before I retire. I have to go and do what CPS wants me to do, or they will cancel me from my other cases. I had to do what I had to do for CM and AJ cases otherwise they will cancel me, and I will never get to finish my case with your sons RV, TM Jr., and MJ."

Defendants, upon further information and such belief, conspired to remove my children without cause, without judicial authorized; without probable cause, warrant; violating my 14th and the fourth amendment, involving myself and my children. My rights, to have children home has been ignored for some time now. The assigned state worker: **JP, AM, DJ, JD, KH, LR, ZT**, and VS and many others on my all 5 cases, conspired for time, to deliberately deprive me of my constitutional right to raise my children in my home, with love, nurturing, care, education and to see that my rights are terminated from my four older children, and they act of a conspiracy; ergo a claim also for, pursuant to Sec.1985 relating to such conspired act by the defendants.

Such written notice, as I understand, through research involving my violation and the intent to sue and notice of my intent to sue, is required, prior to the actual issuance of a suit, for damages.

My children was deprived such right as shall be proven, to breastfeed from their mother IJH of our children TMJR, CM, MJ for some time, while defendant(s) listed continued to lie to the judge, fabricate and or disseminate throughout the entire court process(in state court) to deprive me of, ever having my children home. Discriminating my children and myself for lies and emotional abuse and me by telling the mother IJH cannot breastfeed because it is too confusing for babies to nurse when their full-time bottle formula. MJ did nurse off and on while we are being emotional abuse by parenting coach TS, SW JP, JD other SW's, Supervisors trying to talk us out of nursing. TMJR. Nurse some at the beginning a couple of visits in Dec 2009, and Jan 2010. CM did nurse three weeks. The babies get stressed out for what state workers are telling us. MJ look like he regularly nurses at foster home Susan. Attorney SA and from CPS ISSP report from FM S report. We found out it's possible Foster Mom Susan was neglect, discriminating MJ and IJH by nursing MJ. Violation of the 4th and 14th amendments.

- C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

N/A

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

Alison J. Mielke was assigned as Colleen and Alvin SW in charge of working toward reunification involving my child. She was on the case involving my children from July 1, 2015, throughout Sept 18, 2015.

Dennis Johnson was assigned as Colleen and Alvin SW in charge of working toward reunification involving my child. She was on the case involving my children from Dec 2013, throughout June 2015.

Joel Pettit was assigned as Richard, Tim Jr, Michael and Colleen, and Alvin SW in charge of working toward reunification involving my child. He was on the case involving my children from 2011, throughout Nov 2013.

Alison, Dennis, and Joel, Jennifer and other SW's and defendants have violated my fundamental right as a parent while children were emotionally abused, and physical but sexual. Such worker that is with such intent, deliberately, and or knowingly, with reckless disregard to the harm it was doing to per child, and myself, our family, neglected her/his own policies, protocol, procedural, involving her/his own agency, conspired to deprive father, myself and my, children of such constitutional right, as already enumerated and shall be, in furtherance shared throughout my lawsuit for the civil right damages, and relief. Alison, Dennis and Joel, Jennifer and the other defendants, knew of the harm my children faced, and failed to protect under state supervision and care, by simply adhering to such protocol, by reuniting my children with me to avoid any further abuse to my children.

Alison, Dennis, Joel, Jennifer and the rest of the defendants has discriminated against me throughout. Alison, Dennis, Joel, Jennifer and the rest of the defendants has lied to the court (family judge assigned to the five cases) in order to deprive me of my constitutional right to raise, my children, my children not able to breastfeed their mother IJH, as she was not allowed to nurse my child CMHK, and some children TM Jr, and MJ the SW, and supervisors made a complaint to stop her from breastfeeding, and had sworn to untruthful fact(s) knowingly ,and ,or with the reckless disregard, knowing the judge would be placing high reliance, on her statements, on whether or not my children can be returned to my home, to my primary residential care.

Ann Brice, Christine Pomeroy, Judge Wilson, Judge George Bowden, Judge Ellens Fair, Jonathon Lack, Judge Greg N Boulder Everett, WA and Tumwater, Olympia, WA is a state judge. Defendant shall be served along with the others by way of hand-delivered and or U.S.Postal (certified mail) & or U.S.Process Server.

Ann Hival, Judge Nelson, Christine Pomeroy, Judge Wilson, Judge George Bowden, Judge Ellens Fair, Jonathon Lack, Judge Greg N Boulder is being sued premise on such discriminative act(s) against me, my five children CMHK, RVHK, TMJRHK, MJHK, AJHK.

We, my family, have been severely injured, for some time now, premise on, but not limited to, defendant Ann Hival, Judge Nelson, Christine Pomeroy, Judge Wilson, Judge George Bowden, Judge Ellens Fair, Jonathon Lack, Judge Greg N Boulder, actions, ergo, she/he shall be served timely, right along with the other listed defendants, her/him notice, and lawsuit.

Supervisor Emilee Poth, Suzanne Hashum, Jennifer Lee was in charge of _CM, duties. I be moan over the fact that her assigned caseworker knew of the danger my child was facing encompassing SEXUAL ABUSE, but no one did anything but look the other way,

and the PHYSICAL abuse, and EMOTIONAL abuse, for some time, while in foster care of Sara Crabb while away from her parents.

Supervisor ___ Emilee Poth, Jennifer Lee was in charge of _AJ's duties. I moan over the fact that her assigned caseworker knew of the danger my child was facing encompassing ABUSE, but no one did anything but look the other way, and or the PHYSICAL abuse, and or EMOTIONAL abuse, for some time, while in foster care of Sara Crabb while away from his parents.

Supervisor Emilee Poth, Suzanne Hashum and many other supervisors were in charge of MJ, TM Jr and RV's duties. I moan over the fact that her assigned caseworker knew of the danger my child was facing encompassing ABUSE, but no one did anything but look the other way, and the PHYSICAL abuse, and EMOTIONAL abuse, for some time, while in Foster Care of Susan while away from their parents.

SW Zee Triplet had Edmonds Stevens Hospital put a hold on RVHK, TM JR. HK and IJH for false violations and took boys away never planning to return children back home by all CPS State of WA. Physically, emotional, neglected RVHK, TMJRHK. ZTSW violated my rights with false information on who is a father to my boys.

Everett SW falsely accused a false crime on TJK about MJHK and the Capital Medical Hospital Olympia.

Providence Lacey Hospital false charges. Putting CMHK in mom's belly at risk by; having an ambulance take to Tacoma General Hospital instead of Capital Medical Center Olympia Hospital. Discriminated us and emotionally and medically abuse CMHK.

Tacoma General Hospital falsely took a hold on CMHK order over the phone by CPS Joel Pettit SW. Emotionally abuse me and discriminated my rights by not allowing to be a father to CMHK.

Foster Mom Sara Crab; while in her care emotionally, sexually, neglect, physically, developmentally, physiological, medical abuse to CMHK. Joel Pettit SW, Denise Johnson SW, Amanda Hubeur kept her in this harmful foster home. Dan Brunner CASA tried twice but to report it, let it go after that and agreed with CPS to leave CMHK in Foster Mom Sara Crab to fully adopt her in this harmful home.

Dan Brunner, Ashley Pope Casas put my daughter CMHK by helping State of WA and many SW's like Joel Pettit, Dennis Johnson took away my rights unlawfully and commented perjury and all damages done to CMHK and to take away her father TJK right to be a father to her from birth to present time. Leaving her in the home of Foster mom Sara Crabb who has cared for CMHK has medically, physical but sexual, emotional and many more abuses and discrimination against my daughter CMHK. Emotionally, neglect TJK by discriminating of his right to be a father.

Jody Smetach violated my act privacy rights and commented perjury by giving her/him false information to the court and discriminated my rights

Steve Harding violated my act privacy rights and commented perjury by giving her/him false information to the court and discriminated my rights

John Castele violated my act privacy rights and commented perjury by giving her/him false information to the court and discriminated my rights

Jason Kinn violated my rights by lying under oath in the court hearing and trials and termination hearing. Discriminated and violated my rights to have witnesses in court by calling and threatening him/her. Emotionally harming my witnesses and myself TJK.

Jacob Phillips violated my rights by lying under oath in the court hearing and trials and termination hearing.

Edmonds Stevens Hospital ER RN and nurses violated my children RV, TMJR right and neglected emotional, physical abuse

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

1. All the children being physically, emotional, and spiritually, and development, neglect harm is at the place of CPS The state of WA Foster Care In Tumwater, Olympia, and other places in WA and in Thurston and Everett, Snohomish County. _____
2. CMHK being Physical, neglect, Emotional, Sexual Abuse happens in the place of CPS State of WA Foster care of SC in Olympia, WA or other places in WA. _____
3. Joel Pettit, Jennifer Dunlop, Tina Sandiego and many other SW, and

supervisors stop me so; IJH could not nurse my children TMJR, CM,MJ was not able to breastfeed violation and emotional abuse to HK family happen in the Thurston County CPS Office and Everett, WA Snohomish Office.

4. Joel Pettit, Judge Ann Hersh for not allowing RVHK, TMJR.HK, and MJHK to practice their religion with their mother IJH or see mother IJH at church the SW Joel Pettit complaints and violations happen at CPS Office and Juvenile Court Olympia, Tumwater, WA.

5. TJK and all five children Emotional Abuse for life happen in the State of WA Snohomish, Thurston and other counties of WA. Judges Abuse/neglect rights violating the HK family rights to be full-time parents and leaving children in abuse foster care non-relative and other damages happen in Snohomish and Thurston Counties.

6. Dr. Colby Snohomish County, Dr. O'Leary Thurston County CPS neglect and rights violations of lying on records and only putting what SW in CPS Joel Pettit Tumwater and other SW's Everett WA tell them to put in their report and lying on oath in all trial and other court hearings in Everett and Olympia, WA.

7. Stevens Hospital Edmonds WA physical, neglect, emotional and rights violation to RVHK, TMJR. HK while in hospitals.

8. Providence Hospital Lacey WA medical, physical, emotional abuse rights Violation to CMHK.

9. Tacoma General Hospital in Tacoma, WA emotional abuse, and rights violation to CMHK while in the hospital.

10. Edmonds EMT's Everett, WA. Violated my rights and neglected RV, TMJR,.

11. 911 state of WA in Everett WA violated IJH rights to go the nearest hospital in Everett, By calling Edmonds EMT instead of Everett EMT's.

12. Laura Gufison Counselor Lacey and Olympia, WA for violation lying under oath, Violation Act patients' rights.

13. Joel Pettit, Denise Johnson, Alison Melkie, Jennifer Dunlop and other SW and SW supervisors Manda Hubuer, Kim Grabbrett in all five cases of HK family violations. Zee Triplet and all other SW, SW Supervisors Everett, WA and Snohomish County and Tumwater/ Olympia Thurston County, State of WA violations.

14. Jody Smetak Counselor Tumwater WA Violation Lying under oath, Violation Act patients' rights.

15. Daniel Brunner, Rachael Pope, CASA Olympia, Lacey and Tumwater, WA Lying in CMHK trail and other violation to all five kids while in foster care for all types of Abuse, and emotional abuse. Emotional abuse to TJK.

16. All judges on Everett, WA Juvenile, and other Courts Violation. All judges in Juvenile, Superior, and District state courts, and appeal courts all courts for Thurston County Judges, Appeal judges, and Commissar's in Tumwater, Olympia, Tacoma WA for violations for lying under oath. Jason Kinn, Jacob Phillips CPS State of WA Attorney Thurston County, Olympia, WA Juvenile and Superior Court House and all other Court houses for State of WA Violation act to the appeal court make sure we lose.

17. SW and supervisor my home Olympia, WA for false violation charges and other violations to TJK

18. Everett WA CPS/DCFS called in false charge violation of TJK to Lacey, Olympia WA Lacey/Olympia Police, and Thurston Tumwater CPS.

19. All supervisor Abuse/neglect violations Olympia, Tumwater, Lacey, Everett, Snohomish WA medical Violation King, Snohomish, Lacey, Olympia WA

20. Joel Pettit SW, Dennis Johnson SW testifying State WA violation rights to HK family Children Olympia WA Superior Court House Judge W. Zee Triplet Violation Adopt Foster Homes Snohomish County. Unannounced of location to TJK. Joel Pettit filed the wrong name to court violated TJK, AJHK Rights. Olympia WA. Filed it as EH.

21. Foster Mom Sara Crabb. Joel Pettit, Dennis Johnson, Dan Brunner, Kim Grabrett, Manda Huber, Judge Ann Hersh, Judge Pomeroy, Judge Wilson, Judge Wickham other Judges violated Abuse/Neglect AJHK Olympia, Lacey WA and other places in WA. JP, DJ, DB, AD SW other Supervisors violated TMJRHK, MJHK rights not never were told they had new baby brother, violation no sibling AJHK Olympia, Tumwater, other places in WA

22. JP, DJ, DB other AD SW's Violation no sibling visits AJHK Olympia, Tumwater, other places in WA

23. JP, other SW, DJ Violated CMHK right no sibling visits RVHK, TMJRHK, MJHK Thurston County or any place in WA

24. CPS State of WA violated no visits with RVHK, TMJRHK, and MJHK with TJK Thurston County or anywhere in WA

25. CPS State of WA Violation no visits with CMHK with TJK anywhere in WA or Thurston County

26. CPS State of WA Violation no visits with CMHK with AJHK Thurston County or anywhere in WA._

27. Attorney's violation of my rights and emotional abuse for talking me going out of court and making threats to my family. Everett, Tumwater, WA

28. Joel Pettit violated CMHK, AJHK, TJK rights and decimated us by no visit no visit during the two months trial that was off and on and never made up any visit and two weeks after RV, TMJR, MJ term trail ended. Furthermore, no visit week and a half after term trail started for CMHK. This is putting emotional abuse on AJHK and TJK and CMHK for keeping us apart and other boys too.

29. All SW in Everett and Tumwater has much miss visits that never got made up is a violation act to bonding with the family of all five children.

30. Jason Kinn and Jacob Phillips Attorney for CPS discriminated me and my five children rights, emotional abuse by lying under oath in a court hearing and all trials and termination hearing. Jason Kinn discriminated, emotional abuse and my five children in termination hearing and all trails and hearings. Tumwater, Olympia WA

B. What date and approximate time did the events giving rise to your claim(s) occur?

1. Foster Mom Susan has Physical, Neglect, Emotional Abuse RVHK Jan or Feb Afternoon 2010 –Feb 2011. FM Susan has Physical, Neglect, Emotional Abuse Tim Jr. Jan Afternoon or Feb 2010 – Fall 2014. FM Susan has Physical, Neglect, Emotional Abuse MJHK July 2011 – Fall 2014. CMHK has All types of abuse and sexual abuse in the care of FM Sara Care July 18, 2012, afternoon – Present time. FM Sara C Physical, Neglect, Emotional Abuse in AJHK Nov 10, 2013, afternoon hr. –Early March 2014. CMHK has been Sexual abuse we notice it Sept 2013 – Present time. CMHK Neglect/abuse Seizure Oct 11 2013. CMHK Massive Red Rash on Vagina with sours, some with Yeast Infection Neglect/Abuse/Sexual 2013 – Present. Yeast infection neglect Abuse 2/28/2015 other times 2015. 2014 Massive red

rash with sours Yeast Infection. MJHK, rights violation Foster mom Susan Nursing MJHK.

2. IJH, RVHK, TMJR.HK Abuse/neglect Harm at Stevens Hospital, EMT's Dec 17, 2009, 1:30 – 2 AM or so – 11:40 AM.
3. Dr. Colby violations report spring or summer or so of 2010.
4. Dr. O' Leary Summer, fall or winter of 2011 for violations. _____
5. Everett CPS and all types of judge's violations Dec 17, 2009, 11:30 AM – summer 2011. JP SW CPS/DCFS Testimony March 2015, "Everett CPS helping whole time while Everett WA paid off Thurston County CPS to help State WA never return HK Children Home." _MJHK, TJK to Thurston County CPS, Police Lacey, Olympia; Everett WA SW violation False Charges July 30, 2011, Afternoon. All SW, SW supervisors, supervisor, visits Everett, WA and other Snohomish County Abuse/Neglect/ Dec 17, 2009, 11:30 AM –summer 2011. All SW, SW supervisor, and supervisor visits abuse/neglect Summer 2011 –June 2015
6. JP Testifying rights violation State WA did to HK Family/Children March 4, 2015. DJ SW Testify for Violations State WA did to HK Family and Children March 24, 2015__
7. BS PC violation lying in oath court and reports summer 2011-2012
8. Zee Triplett violation adopts HK Kids and violated their rights 9/17/2009 Jennifer Dunlop and other SW (unknown) Violated MJHK false charges violation, broke Seat Belt-Car Seat law July 2011 afternoon.
9. Joel Pettit SW Violated TJK and AJHK rights and filed the wrong name EH to court Sept 2013. FM SC JP, DB, KG, MH, Judge Ann H other Judges violated Abuse/Neglect AJHK Sept 2013 – March 2013.

and AJHK rights and filed the wrong name to court Sept 2013. FM SC JP, DB, KG, MH, Judge AH other Judges violated Abuse/Neglect AJHK Sept 2013 – March 2013.
10. JP, DJ, DB, AD SW other Supervisors violated TMJRHK, MJHK rights by never were told they had new baby brother, violation no sibling AJHK Nov 8, 2013 – Present JP, DJ, DB other AD SW's Violation no sibling visits AJHK Nov 8, 2013 – Present
11. JP, DJ, DB other AD SW's Violation no sibling visits with TMJR, MJHK

with RVHK Feb 15, 2013 – spring 2014, May 2015 to Present

12. JP, other SW, DB Violated CMHK right no sibling visits RVHK, TMJRHK, MJHK Thurston County or any place in WA Feb 15, 2014 – Spring 2015.

13. CPS State of WA violated no visits with RVHK, TMJRHK, MJHK with TJK Feb 15, 2014 – Present, 12/18, 2009 – 12/23/2009, Everett WA Judge order Xmas Dec 25, 2009, Visit no visit. Multiple occasions TJK goes 1 to 2 to 3 weeks without seeing RVHK, TMJR HK from 12/18/2009 –Feb 13, 2014. MJHK Sept 10, 2010 – Feb 13, 2014.

14. CPS State of WA Violation no visits with CMHK with IJH middle June 2015 – Present, Feb 14, 2014 – End Feb 2014. Went almost two weeks no visit.

15. CPS State of WA Violation no visits with CMHK with AJHK middle July, 2015- Present. Had multiple occasion AJHK no visit with Colleen March 2015 – June 2015

16. Emotional abuse talks me out of going to trial fact-finding hearing RV, TMJR Jan 2010

17. SW JP had SW Olympia Hospital falsely remove AJHK on the 2nd day after birth. Put AJHK at medical, physically harm by removing him one day early. Nov 10 noon or after.

18. Jason Kinn Lying under oath in all hearing, trails and termination hearing. Discriminating my rights to have witnesses, emotional abuse. End of Approximately 2010 – 2013

19. Jacob Phillips Lying under oath in all hearing, trails and termination hearing. Approximately Jan – June 2015.

20. All SW CPS State if WA and supervisors for Miss Visit's violation for not made up many miss visits Dec 17, 2019 – June 2015.

21. All SW CPS all departments no medical visits or school activities violation act to the father TJK with her five Children while in the care of CPS Foster Home Non-Relatives. Dec 17, 2016 – June 2015 off and on. All SW's CPS has a medical records violations to TJK.

C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*

1. Family Court House hallway and room CPS attorney, the father attorney JC, and Mothers attorney AB was telling the father to talk IJH out of going to a trial fact-finding hearing for RV, TMJR. JC attorney talks to the FATHER TJK he and the rest talk IJH out of going to trail when We want to fight in court for our boys. In court, everyone shakes their head no when IJH look them. There was some threat the father Tim and attorney said: "the case is going to lose at the end so, if you ever want to have visits with your kids then you better say no trail." Judge ask IJH multiple times if we wanted to say no trail. Everyone in the courtroom shakes their heads and gives her the no threat look. They all discriminated my right to fight for my kids in the trial. Emotional abuse me, and my two children RV, TMJR. Judge (Unknown could be Ann Hersh Tumwater/Olympia) had a trail with only Jason Kinn, SW Jennifer Dunlop, Joel Pettit SW, SA IJH Attorney SA, and TJK attorney. Moreover, discriminated my rights by not allowing me to go to Fact Finding a trial for my son MJHK. All emotional abuse me and my children and discriminated me as a father.

2. State of WA, DCFS/CPS SW's Joel, Jennifer, Dennis, Triplet and other witnesses, SW Supervisors, Supervisors, Parenting Coach Brenda Sullens S, Counselors Jody S, Laura G, Judges, commissioner, CASA Dan B other CASA Supervisors, Phycologist Dr. Colby Dr. O'Leary to my HK children wrongful, and the continual violation-removal involving my child, pursuant to:

Title 42-U.S.C.Section 1983; 86; 85.

3. Add' l damages pursuant to such false statements to undermine my ability to have the children returned. Fabrication of evidence, and or continual false statements that were made by the defendants since date listed. Furthermore, was encompassing discrimination, defamatory, of the 14th amendment, and libel, as moreover, my children and myself have been suffering ever since the state defendants have unlawfully, and or unconstitutionally, unwarranted, and remove my children conspired act, to deprive, failure to reunite, submission of perjury, 4th amendment, 1st and various other tort-related, and federal suit claim(s) for which, are associated with the injured parties suit, to be filed accordingly, and timely against the liable defendants. Suing for the familial association of violation. The right to such companionship. The intent to deprive, continual federal violation, and the state gross negligent act(s), negligence, failure to train its employees, suing for submitting at each hearing, and or through the sworn-in affidavit(s)

false information, recklessly per defendant, and or knowingly, with an intent to cause me, the injured claimant harm, so my children is never to be returned to my primary loving care. Furthermore, and have the state of WA change my children full identity back to their original full family birth identity.

My children and I have severely injured.

4. We just found out from CMHK termination hearing; JP SW testify on 3/4/2015, and SW DJ SW testify on 3/24/2015. Both these SW testified in court and said RV H-K, TM JR. H-K, MJ H-K, CM H-K, and AJ H=K were put up for adoption the day they got taken away from the parents. It was ordered by the head department of WA that is overall CPS of WA." Joel Pettit testified and also says "Snohomish County Everett WA bought out Thurston Tumwater CPs to make sure all children and all future children get sold immediately after getting taken away from the HK Parents It was a setup from day one, even on all the courts (Family Juvenile, superior, appeals, state courts) were all set up by the head department of WA over all Department agency to make sure the parents' rights get terminated to all children and all future kids. There was a % put down on all five children the first day CPS took them away from HK parents. Even Alvin was not supposed to return home to the parents either."

5. Zee T SW, Jennifer D SW, Joel P SW, Dennise J SW, Alison M SW, Jason K State Attorney, Judge Ann H, Stevens Hospital Staff 9/17/2009, Edmonds Fire Department (EMT's) staff came to my house on 9/17/2009, All SW, All head SW supervisors, All SW supervisors, Kim Grabrett, Judge CP, Judge Wilson, all other Judges that were on our case between Everett, Tumwater, Olympia Family, Super, commissars, Appeals that help steal my five properties of RV H-K, TM JR. H-K, MJ H-K, CM H-K, AJ H-K. Dan B CASA, Guardian of Light help Denise Johnson, steal my property of Colleen Mary H-K. We heard Denise Johnson testify in court CMHK trail March 2015 and says "you better terminated the parent's rights to Colleen if you know what's good for you. Kids be in the state care tell they reach 18 years old. Because the head department will never trust these parents with their children. All children have already been adopted out, the 1st day they got taken from their parents."

6. When we saw CM H.K; with her brothers RV H.K, TMJR H.K., & MJ H.K. Our Parent Coach Tina S, and CASA DB said "We have improved a lot, we are safe with all four kids. We can learn anything and apply to what we have learned, during our visits with our children; they recommended that the children should be returned to their parents care." There is a home service that they both recommended, through Tina S agency. Both of us parents agreed to do these home services. That can only happen when the children return home. 2012-2014

7. There is evidence that shows Jason Kinn Attorney for CPS; calls the witness before the court, and threaten them not to appear in court, or else! Gary Briggs a witness, about what Jason Kinn said when he called him not to appear in court.) We have Dr's wanted to be a witness in court until, JK talk to them, after that they refuse to talk in court. Boys Termination hearing Dec 2013-Feb 2014.

8. Judge Cristine Pomeroy says in the boy's termination hearing. "How dare you go against CPS, don't you know, they are GOD." She pointed to the parents, both parents' attorney, and Casa, everyone else in the court that is against cps. The judge expressed her opinion in court and committed perjury by breaking the right law. The law states "Judges, people in court cannot express their opinions. That they have to go by facts and evidence only."

9. I was wrongful, accused of not being a safe father to my kids." There was enough evidence that showed that CPS has documents that we should have got the three older boys back into our care. There are other services that the other CPS teams could have offered and did not do to help your kids come back home." Our SW Dennise Johnson says, and her attorney Jacob Phillips says in our first meeting in December 2013.

10. CMHK has been Sexual, Physical, abused Since Sept 2014. She acts and has the systems of Sexual molestation/Rap. Her vagina is open, and often red as an apple when we first help her to the restroom. Her Aunt Karen Carbon and her Bio Grandma Colleen Valliancour has seen what she looks like with request from parents TJK and IJH. They both compare CMHK to their granddaughters. CMHK does not look normal. They both say "There's something going on in that FH. She does not look right." Other systems she had does not want to use the restroom or get change and cries if you try or even change her clothes and resist. TJK and her mother IJH taught her to dress, change her pull-ups, and even clean herself. Furthermore, CMHK even will ask if she needs any assistant. Her face looks sad but, happy and comfortable the way mother IJH and TJK taught their daughter to help herself.. Often' CMHK comes to the visits, and her hair smells like dogs and often smells like she has not had a bath with her hair looks like it is not brushed. Last two months we saw CMHK she had a burn mark on her arm and one on her knee by her leg. Moreover, she had multiple bruises on her arms, legs and a red rash on her neck. I called the hotline; CPS drop the abuse/sexual case. May/June 2015. CASA DB called Hotline for us too early 2015, or late of 2014. Again CPS drop the case. Colleen has a rash with lines on her private lip that has been there since she was three weeks old. It does not look good.

11. RVHK had stitches by his eye the 3rd day he lived at Foster Mom Susan. Next day TMJRHK had stitches on the opposite eye than RVHK had. RVHK told me in one of the visits. "Mom what happen to me is the same thing that happens to TMJR." Summer 2010. I have seen bruises, scars that don't look normal. One example: SW says "RV ran into a wall got a bruise." When Aunt Karen C, father TJK, and mother IJH saw his ribs, it was a big red bruise mark. RV looked like abuse from other happenings. TJK called the abuse hotline and CPS drop the charges again. One of the visits IJH asks questions to RVHK to get answers. I learned that how you get kids to talk. After 3rd or 4th question I the father Tim witness and heard Mother IJH talking to RVHK was comfortable to talking to mother IJH and says "Mommy MEME is mean. She hits, pushes and kicks (RV, and brother TM and FM S." CPS found out RV Told IJH he was removed from Foster Mom Susan three days to a week after RV told IJH what happen. FM S makes up false charges about RV. RV says it is her A S that stabs a fork in TMJR. Hand and I (RV trying to protect brother TM Jr... I get punished and beat up." Here are examples of how it is like at FMSUSAN house. They moved son MJH into a home with TM JR. RV was placed good home RV says' RV says "I am worried about brothers TM Jr, MJ that FM S is mean. Please help get them out." I ask judge and CPs to remove my sons from home. CPS Joel P SW refuses to remove my boys and left them in the abusive home to harm them. I even ask to remove boys when RV was living there. Again Jennifer D SW refuse to remove them. Violated my boy's rights and discriminated them by leaving them at the harm of FM Susan and other Foster Homes in Snohomish too. Discriminated my rights to be able to place my children safe home.

12. JP SW, JD SW discriminated my son RVHK and violated his right because CPS-SW Joel Pettit never gave important letters to father TJK to invite him to RVHK School Graduation and activities and medical appointments. TJK wanted to be with his son RVHK on those important dates. **RVHK is emotionally harmed because both of his parents IJH and TJK was not able to attend without an invitation letter From FM DH that they never got.**

13. Under the 1st, 4th, and 14th amendment; My children are being descrimnated for their human right to their religion, and They are and I the father Tim is a law-binding citizen. My five children and ther mom IJH hold the religion beliefs of the Mormon (LDS) Church. (RVHK also, got his rights violated by not able to get baptized when he turn eight years on Sept 8, 2014. Mother IJH taught him about baptism, and he was interested in getting baptized like his mother did at eight years old. Their mother IJH and I TJK put a request in at court with Judge Ann H. Joel P SW refuse to let the kids go to their LDS Mormon church. He says" it is unappropriated for the kids to go to the LDS Mormon church because the foster parents are not Mormon, and the adoptive parents that are ready to adopt the

children are not Mormon. I do not know what religion they are, but I know that they are not Mormon" I help put a request in to either have the kids attend at mother IJH ward, or the ward down by where they live. All children were interested in the church. IJH their mom was teaching the gospel to the kids in the visits sometimes, and Joel Pettit would say "it is a unappropriated language for their age" because of what she was reading scriptures and other LDS material and videos that she got from the church library. All of the kids got blessed in their church at birth, so they are all LDS Mormons that I agreed with their mother IJH.

15. My children were deprived such right as shall be proven, to breastfeed from their Bio mother IJH and the children TJR. HK, CMHK , MJ for some time, while defendant(s) listed continued to lie to the judge, fabricate and or disseminate throughout the entire court process(in state court) to deprive me of, ever having my children home. Rights violated to MJHK, TMJRHK, CMHK and myself for JP and other supervisors, PC BS, PC TS and others emotional abused my family by saying rude comments, and trying to get me to stop nursing. I find out from another source and some 4th and 15th Amendment. Report FM Susan is nursing MJHK that is against MJHK Violation rights and emotional abuses to all HK Kids and family.

16. Our parenting coach Tina Santiago told us one time "Joel Pettit SW met him in the cps office and threatened her to lie on your reports or else" She told him "I will never lie on my reports. I only tell what is happening. If I see something wrong, then I will report it. If I do not see something wrong, then I will not report something that did not happen." Other supervisors in the past have lied on their reports for CPS SW's. Even one of the supervisors Suzzanne H told us the last time we saw her "I am so sorry I lied in court for cps. I was only doing what I was told to keep my job." She was so upset and crying because we lost the boys. This was: Feb 14, 2013, the last visit with the boys RV, TMJR, and MJ. We had comforted several supervisors in the past, when we tell them "JP SW said you said this on your report" Supervisors would say "what I did not say that, I said this is what happen. (They would describe what happen) T and EP is one of the supervisors we would comfort of what JP SW old SW and DJ SW said, and many other supervisors with old SW like JD SW through Thurston County, Tumwater, WA, and Snohomish County, Everett, WA. JP SW said something about PC TS in court one time toward the end of 2012. When we confronted it with PC TS, she said "what' that did not happen." She called IJH CPS A SA and talked to her about it. PC-TS wrote a letter to explain what happen in that situation that did not happen.

17. SW JP and SW SUP KG depriving my rights of a violation for making false charges and statements about TJK putting TMJRHK in a time out and not doing it to RVHK. Making false statements that I could not control RV when he was over

aggressive. Two boys are 2 1/2 yrs. apart. TMJRHK going through two's and 3's just learning stage of listening and obeying that get more timeouts than a 5-6 yrs. old. Supervisor lies on their reports and leaves out half the stuff that happen each day like for an example: I put RVHK in time out sometimes and take the toy away a time out too. I tried different strategies hoping it will help my children. Most the good stuff I do with my children gets left out half the time or more especially timeouts.

18. CPS SW JP, DJ and many more TC, and EVWA CPS/DCFS has been discriminated my right is a violating to trying to teach my kids basic education and the essential of life and safety. My three boys RV, TMJR, MJ was ahead in their development until CPS SW ZT, JD took them away from HK Parents. The children I heard from an attorney, Casa, Supervisor that they heard from FM the boys cry, not socializing with others, stay to themselves, and not play, not eat much, and aggressive. This is when they boys first get taken away from family. The state of WA CPS and officials have deprived my children of their development by putting my kids at the serious harm of physiological, emotional stress trauma. All five children and I are going through emotional stress trauma for what CPS SW's, many staff employed by State of WA and others contracted out by the state have put HK family at medical health risk. TJK Dr. Paul Knouph says "Only way to fix emotional stress trauma is to return all children back to the parents. Then, it takes time and many years with help from loved ones. The children would need counseling help.

19. Many SW's like JP, JD, PC TS, PC BS, supervisors discriminated my rights by violating and depriving IJH and TJK to feed good meals and be able to feed themselves. Violated my parent rights to bring what I want. Emotional harm on my family. Their making complaints and false charges on IJH and TJK brings too much food. Only allowed to bring food for children only. For an example; IJH and TJK always bring food to feed them-self. IN Foster Home Susan, I heard from a supervisor is Vegetarian, only eats white meat on holidays only. Eat hot dogs sometimes and no other meat. We usually bring a well-balanced meal to feed them. My children eat my meat. We teach them by encouraging them, and the boys eat very little food in a quick hurry during the visit They are afraid that they will not have time to eat mom and dad's food. CPS SW JP, JD, and supervisors making false charges on boys throw up after every visit at the car. RV says "Mom they are lying. My brothers TMJR, and MJ and my self does do not throw up after each visit. Only a few times ever so often if were sick. Then no one tells you mom, dad or I when my brothers our sick before the visit." CPS/ DCFS SW's Like

JP, JD both counties violated TJK Parenting rights by not letting TJK know that one of her children might be sick before the visit. The supervisor and SW never phone call or email him about when we have a visit; only when they cancel a visit. TJK Had many visits show up, and no one ever calls him. Joel Pettit was the SW at the time. Even CASA Dan Brunner showed up a couple of times and no visit, and he never got an email or a phone call either. CPS Front desk acts like they do not know anything about it.

20. Joel Pettit SW CPS, State of WA, Jennifer Dunlop SW and many others are discriminated TJK for having a learning disability, being a poor white man. TJK learned from IJH with her while they watched many education videos online and educated herself to teach her children and themselves.

22. My rights have been violated after IJH told about what happen to the children, herself with the EMT's. When I came home that evening. My stuff was thrown all over my trailer home. EMT neglected my trailer home. IJH tell me and testifies in 2014 and 2015 termination hearing for all four older children. "EMT's Edmonds took a long time to get to IJH Home. EMT's did not know where she lived. RV on the bed. IJH TMJR HK goes to EMT's. After they arrive. IJH Sends one of the male EMT's to get her son RV, coats, diaper bag and baby car seat. EMT male comes out no diaper bag or coats. He only came back with RV. IJH had EMT male go in get her diaper bag, RV coat, and her coat. She told him where it was. He comes out RV car seat and father TJK coat. IJH send him in the 2nd time. He comes out with IJH coat. No coat RV, no diaper bag. He refuses to go in again to get RV coat and diaper bag. Then he put my girlfriend IJH in jeopardy for not listening to her for knowing where it is at. IH was not allowed to go back in in the trailer. IJH had no change of diapers, clothes for the kids. No snacks for the kids. EMT Male stayed in the trailer for 15 min or so. EMT male refuse to grab green diaper bag, RV coat." EMT put my children in serious physical abuse, emotional abuse, neglected my children and our rights of the Constitution rights.

23. Stevens Hospital put my children at serious risk and harm my children health. From Irene comments on many emotional and other harmful acts to my children, she said to me and testified in both terminations hearing 2013 and 2015. "Nurse refuse to get caller ID button. She had no caller ID to call for help. 3 hrs. Alternatively, so RV help mom with directions from IJH. RV was able to find remote on TV and Caller ID Button. The staff neglected and abused are rights to call for help. Refuse to get diapers and gown for my baby TMJRHK, and diaper, water, food for RV. The nurse says "there is no caller ID button in ER. There is no food/water in ER. Mom is telling her where to get it, and she still refuses. Mom had walked painfully in the hallway with stomach pain. Since IJH used to

be a CNA she knew where the supplies cart where. Guy nurse asks if she I need help and told him what she needed. After he saw her trying to help herself to diapers. She was able to get diapers for kids. RV was neglected, emotional abuse for not allowed to go to the restroom for the fourth time and not bringing diapers right away. RV was neglected, emotional abuse for not bringing food/water for him for 5 hrs. After being in the hospital and taking his food/liquid away after half hr after they brought it. RV was not down eating or drinking. TMJr was neglected for Hospital staff not bring diapers right way and no gown. IJH was neglected, abused dehydrated, starving. Hospital RN neglected and discriminated IJH Rights also, by not following ER Dr. Order to have stomach MRI at 3 AM it was ordered. RN waited to put an order in till 7 am. She was not allowed to have no food/drink. Only had the MRI liquid med only. After 7 am not allowed to nurse TMJR. They only gave TM JR. 4 1oz bottle of formula to TM Jr. Male Nurse Refuse to give him no more milk after 9:30 AM. Feed him at 8 AM. He usually drinks 8oz in IJH and TJK Care and TM Jr is seven months old and tall for his age. Nurse male refuse to give him no more than four bottles of 1oz formula. The nurse never changes Tm Jr diaper. He was in their care after 8:30 AM. Mom was not allowed to hold Tim Jr. after Mom got back from MRI after 9 am. Hospital staff discriminated Richard human rights, by wanting her to punish him for giving affection to his brother baby Tim Jr. IJH refuse to obey their orders and tried to hold and comfort RV for he was emotionally, and physically damaged for the false changes the nurse put on him. My children rights are violated by many harmful acts, and the discrimination act by keeping them away from their birth mom and neglecting RV by not allowing him to use the bathroom after IJH was not allowed to take our son to the bathroom. Neglected TMJR by not giving him enough formula to fill him up and not bringing diapers or a gown when he needed one. Emotional abuse me TJK and both of my children for what happen in the ER and for keeping them in the ER too many hrs. And for violating my rights to be a father by helping SW Zee Triplett hold my HK family so TP can unlawfully take my children away from me. Zee Triplet lied about who is the father and discriminated my brother Ed K, who lived in the local area my son's uncle. CPS refuse to let my Kittleson family have my children.

24. When I had a court hearing and termination trial they had pictures of my bothe11 trailer that is vacant when they took the pictures. I found out that SW Zee Triplett took a bunch of pictures inside and outside the home. (2007 CPS help our landlord kick us out. When we had a court hearing Everett, Judge ordered us ten days to move out and not allowed to return or step on the premises. On the 10th day, I was the only one there and left. IJH and RV were at a hotel. SW Triplett discriminating my rights and unlawfully taking pictures and entering against my permission. The trailer is still mine for at least a month. The trailer was secured and locked.

24. TJK did not know Tim Jr had Mersa until I went to a visit. CPS never told me about his health problem. Foster Mom Kelly Flowers told us approximately two weeks after she knew about it in some time in 2010. This is like the CPS SW State

of WA hides things like medical problems of all five children and wait a while till they tell us if they tell us. If they are even telling us the truth. They tell us only what they want us to here.

25. Snohomish County Everett CPS SW tried not to let my son Tim Jr go to his six months checkup for his penis surgery. The foster mom Kelly Flowers tried to work it out with CPS IJH attorney Ann Brice had to go to the judge to get permission for me to attend his surgery checkup, and to allow Tim Jr to go to his checkup and allow HK parents to attend with FM KF. CPS SW from Everett WA she said: "TM Jr penis looks normal to her, that he does not need to go to any Dr. Appointment." CPS violated my rights and TMJR and TJK rights for trying to stop it. Furthermore, CPS SW emotional Abuse on the family and HK parents.

26. Wrongful, and the continual removal of my children, whose been forced to live without me each passing day when there was no imminent danger, no exigent circumstances, no court order, no probable cause whatsoever.

27. Failure to protect my five children RVHK, TMJRHK, MJHK, CMHK, AJHK.

28. Failure to adhere to the state of _Washington policies, protocol, procedural et.al., that, as a result, has caused injury to my child CM and myself for over three years. Moreover, to my child, AJ for over two years for his family for being split up and living in the foster care of Sara Crabb from the 2nd day of life to 3 ½ months old. Moreover, for my children RVHK, TMJR. HK, MJHK and myself for aproxamly six years and three months as of date filed.

29. Failure to be for the right, per statement against me in so far as withheld exculpatory evidence, that would have permitted my children to return home, at once while encompassing in their reports false information, and all the while knowing the judge adjudicating over such matter would place reliance on those false reports, in so far as whether or not to return my children _CMHK, RVHK, TMJR.HK, MJHK __to my care.

30. Providence Hospital Lacey WA put CMHK at medical health risk by not checking how long IJH is in the ultrasound of being in labor. Sending IJH and CMHK in an ambulance to Tacoma General Hospital instead of Capital Medical Center SW Olympia, WA. IJH and TJK requested to go to Capital Hospital. Staff refuse making false statements and false charges on IJH. Hospital staff expect labor mother to wear full clothes inside and out, wearing a pad to catch water when my water broke at home. She was wearing a strapless dress with a towel between her legs to catch the baby's water for being in labor. For the safety of CMHK and the mother IJH she had to rush to the hospital dress as is. Providence

Hospital and Tacoma General discriminated me against my rights and emotionally harmed and neglect IJH mother and CMHK. Discriminated TJK rights to be a father and emotional harmed my HK family. July 16, 2012

31. Tacoma General Hospital discriminated, emotionally, CMHK by removing her from my care and the mother care IJH because Joel Pettit SW put a false charge on us HK parents of CMHK over the phone to the RN and Hospital SW. Hospital SW and RN had emotional abuse and discriminated my rights to be a father to CMHK.

32. JP SW CPS, DCFS, DSHS and other defendants on the case physically, emotionally, neglected, developmentally, Physiologically abuse and all other harmful acts, and discriminated CMHK, MJHK, TMJR HK by leaving them in abuses home and ignoring and covering up what is going on in the FM of SaraC and FM Susan.

33. Sara Crabb Foster Mom overdose CMHK on Medicine that gave her a 104' Temp that cause her seizure. CMHK was discriminated, physical, emotional, developmental, physiological abuse and harm by FM Sara C. FMSC is making up false charges against Walmart Pharmacy in Lynwood. TJK her father went to talk to the manager of Walmart Pharmacy. He looked up the records and their company does have on file that they put the correct dose on CMHK bottle that was ordered by her Dr. FM SC is the one who overdose her on medicine." We notice sexual abuse symptoms from that Abuse on children class and what to look out for, plus we watch videos on this subject as well and studied up on it. Sept that is listed above on dates; she had symptoms of sexual abuse/molestation/rape symptoms. Her vagina lips wide open and before this date they use to be close. She looked redder and with sores down below, afraid to get change in pull-up, diaper or clothes no matter if it is a female or a male. She acted scared when it was time to take care of her body problems. She comes to visit and looks pale and looks like something happen to her when you look at her face and her reactions. As describe above in more details on this subject. CPS DJ did take her to the sexual clinic in Olympia, WA with her and DB Casa was the only one there. They refuse to let TJK come to her medical appointment and decimated my rights to her medical needs.

34. Whole time being on CPS problems. We never get to go to medical appointments with any of our five kids since they were taking away if they live at a non-relative home. Except for RV when he live at the last FH in Tumwater only by letters only invited if we ever got them. The only time we got the letter is when RV personally has the letters in his backpack to give to his HK parents himself. TJK was being discriminated against his rights, by not allowing him to take care and bond with his five children during any medical or school

appointment while in Foster Care of CPS in a Non-relative Home. Only Kelly F FM is the only one that allows us to go to their medical appointments. She had to fight for this over and over with CPs, and IJH attorney AB had to fight this in Everett Court.

35. SW JD and JP discriminated RVHK and TJK rights by not following the court's order to allow phone visits once or twice a week at the last FH RV was at.

36. The WA Family Superior Juvenile Court Code allows a law enforcement officer or a duly authorized officer of the court to take a child into custody, "if there are reasonable grounds to believe that the child is suffering from illness or is in **immediate** danger from his or her surroundings and that his or her removal is necessary."

37. My child was removed unlawfully, and or was not returned when removed, the premise on the failure of these employees to adhere to such policy, protocol, that was involving the agency in Everett and Tumwater WA CPS, DSHS, DCFS The State of WA; by intentional, by deliberate means by such defendant and or defendant(s) listed in such timely notice.

38. I and my five children have been injured by such unlawful and or unconstitutional act by the defendants, now served.

39. There was no imminence; no serious injuries and or no "illness "that would have required my WA state agency "CPS" to conspire continually, and or to infringe one's civil and constitutional right, on such date listed above, and or throughout the warranted noticed of tort; federal suit claim notice, as to my intention to sue in due course.

40. Such notice requirement shall satisfy the requirement, with enough general information that is related to my claim, prior to suit for which will be followed by the proper course of time after the actual proof, as to my notice(s) being filed as I have ergo, stated claim for relief as required involving the afore said defendants. The actual U.S.District Court (federal lawsuit) shall be for all that is enumerated throughout such timely notice, and other associated claims, various torts et.al, for civil right monetary damages, declaratory, injunction relief et; al., against the agency and or their individual defendants. A general statement summarizing such events that make a claim, to be considered is warranted, as case law support involving such tort claim(s) state-federal et.al, hence such claim being stated for relief, shall be made, before the institution of one's federal suit against the listed defendants describe above.

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and

state what medical treatment, if any, you required and did or did not receive.

1. All children RVHK, TMJR. HK, MJHK, CMHK, AJHK all have emotional, physiological, and spiritual, neglect and all types of harm damage for life. I TJK have emotional, physiological, neglect and all types of harm damage for life and discriminated against our rights for what all defendants that have violated and harmful acts.
2. Unknown if the children receive care. RVHK did receive some counseling care. Unknown on how much or if it helped. All children required having to a counselor to an honest, reliable person who did not get any care. The Counseling that I had, they were only opinions from what CPS SW wanted them to do only. He did nothing to help me. Emotionally harm, discriminate my rights. If I and the children required having counselor I am willing to have honest, reliable person.
3. Physical, emotional, neglect, spiritual harm done to RVHK, MJHK, TMJR.HK while in some foster care in Thurston and Snohomish Care of a Non- relative. Bruises, scars that had 3-4 stitches by eye for RVHK and TMJRHK. Scars and bruises on all children. MJHK finger slams in the door by foster mom Susan. RVHK told IJH FM S Physical Hit, push, kick all RVHK, TM JR HK, FM Susan A S. Red Rash sours on privates for TMJRHK, MJHK.
4. Physical, sexual, emotional and neglect, harm done to CMHK while in foster care of SusanC. CMHK had some speech therapy that helped. Speech Therapy was stopped April 2015. CMHK did not get help for her seizure while in the care of SC. Her Dr. referred her to someone, and they did nothing about it. She needs an honest Dr. and a second opinion about her medical health. CMHK multiple bruises on the body, cuts, scratches, red rash on arm and neck, burn mark on arm and knee/leg, red rashes on the neck, private parts, sore red rashes on private parts, rash mark on private been there since three weeks of age. Smell like not had a bath for a while. Smells like a dog when she comes to visit. Hair is not brushed most the time beginning of the visit.
5. Fm Susan neglect, medical health abuse, physical, sexual, emotional, and all the above harmful act and discrimination of my daughter rights and my rights. SC foster mom gave Colleen fruit and cereal at two months of age. Her Dr. from SC Foster mom gave her juice at two weeks old.
6. CPS SW, CPS Paid Supervisor, Parenting Coach psychically, emotionally harm and neglect and discriminated TJK, RVHK, TMJRHK, MJHK, and CMHK. Discriminated my children and my right by Refuse to let them nurse TM Jr., MJHK, CMHK and emotional abuse, and neglect for not wanting IJH to nurse my children. RVHK, TMJR.HK, MJHK spiritually harm by CPS SW Joel P and all other SW's TGHSP, CPS SW JP emotionally harmed CMHK False charges remove CMHK from TJK Care.

7. AJHK Emotional Harm. Capital Hospital, SW Joel P False remove AJHK from the care of TJK before he left HSP. Emotional Harm while in the care of Sara Crabb Foster Mom.
8. AJHK Physically Harm by Sara C Foster Mom. AJHK had tremors in his arms while in the care of SC FM. At the beginning of the visit from when tremors happened. He look pale in his face. _____
9. Mother testimony she told me and testified in termination hearing 2014, 2015 and said "RVHK, TMJR HK MOTHER IJH was neglect, physically, emotional harm by Stevens HSP, EV SW CPS. SW Triplett picked up and ran with RVHK His head wobbled back and forth every time. Neck hurting. Stevens HSP Nurse Male ran with TMJRHK possible neck injury. Steven HSP RN Starve and Dehydration RVHK many hrs. HSP False charge Hold on children emotional harm is not allowing them to be with IJH. RN Emotionally, Neglect Harm RVHK, TMJR. HK, Mother IJH for arguing with IJH in front Kids on False charge about RVHK false charge on TMJRHK. TMJRHK and IJH were neglected and emotionally harm by RN for not allowing IJH call ID HELP. IJH need Diaper and gown ASAP."
10. Stevens Hospital put a hold on my children for what SW T told them. Furthermore, they put my children at risk and Emotional and neglect Harm by RN SHSP; EV SW CPS never told IJH why she was on hold in HSP for many HRS. RN Starve and Dehydration IJH. RN refuse to get Caller ID Button for IJH. IJH had no caller ID to call HELP for 3 HRS. The SW Triplett State of WA emotionally and neglected me by lying who the father is and keeping my children from me.
11. EMT Ambulance Male Neglected, physically, emotional harm on RVHK, TMJRHK, for not getting kids diaper bag, RV Coat when IJH mother instructor where it was. No supplies for kids at Stevens HSP...Her testimony in the termination hearing of 2014 and 2015.
12. Property Harm by EMT Ambulance Male Neglected property items was thrown everywhere. Emotional abuse.
13. 911 Everett State of WA violated and discrimination act by calling Edmonds EMT instead of Everett EMT when I live in Everett that is 2miles from Everett hosp. Edmonds 20 min away. Emotional abuse on RV, TMJR.
14. Jason Kinn violation act for a pegroy oath in court hearings, trials and termination hearing and a violation act to call my witnesses and threaten them in boys termination

hearing and Dr's too. Emotional abuse while in court trials and hearings to HK family, and witnesses.

15. Jacob Phillips violation act for lying in court under oath a violation of court laws and my and my children rights. Emotional abuse to HK family.
16. Joel Pettit and other SW, supervisors visits, Parent Coaches and other state workers and paid contractor workers on all five cases lying in court and emotional, medical, physical, developmental, spiritual, physiological all forms of abuse and harm on all five children and emotional, physical abuse on TJK. Joel Pettit in proximally 2013 or 2014.

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Return all children back home ASAP

Have the State of WA CPS change the children Birth Certificate back to the original Birth Certificate with the biological parents of IJH and TJK. Must have the original birth name, birth place, birth hospital, birth date, birth parents of IJH and TJK. Must change the original SS Number back to the original Birth SS Number all children had from their Biological Birth.

Suing the State of WA, CPS, DCFS, and all official child offices of Thurston Tumwater, and Snohomish Everett, WA for all damages, and discrimination of our rights to Mother TJK and his five children of RVHK, TMJR.HK, MJHK, CMHK, and AJHK for the amount of \$ 10 million dollars for each family member or what the magistrate deem appropriate, reasonable and just.

All parties involved in all five cases of RVHK, TMJR.HK, MJHK, CMHK, AJHK of the father TJK. I am requesting that all parties comment false perjury and had all parties put to prison for five years Or what the magistrate deem appropriate, reasonable and just.

Have the state pay for a four bedroom, two bath house to buy in full or $\frac{3}{4}$ of the price of the house. Alternatively, what the magistrate deem appropriate, reasonable and just. The birth parents TJK gets to pick the type of house and the place to live and any state to live in.

Have the state of WA pay in full for a Mini Van that sits up to 7 people. The parent TJK gets to pick type and style of the van in any state. Alternatively, what the magistrate deem appropriate, reasonable and just.

I am sewing all Defendants, \$200,000 for all damages done, and all discriminating TJK, RVHK, TMJRHK, MJHK, CMHK, AJHK Or what the magistrate deem appropriate, reasonable and just.

Cancel all parties career business license, professional licenses and or certificates so, they cannot practice their career for 10yrs. And they cannot work with children in any type of career. Or what the magistrate deem appropriate, reasonable and just.

I am sewing the state of WA \$600,000 for damages on my children religion (LDS Mormon Church) Or what the magistrate deem appropriate, reasonable and just.

I am sewing all Judge, \$500,000 for all damages that were done, and all discriminating TJK, RVHK, TMJRHK, MJHK, CMHK, AJHK Or what the magistrate deem appropriate, reasonable and just.

I am sewing DANB Casa and all Casa defendants, \$150,000 for all damages done, and all discriminating TJK, RVHK, TMJRHK, MJHK, CMHK, AJHK. Alternatively, what the magistrate deem appropriate, reasonable and just.

I am requesting to have all money paid to the State of WA for Child Support for RV, TMJR, MJ, CM, AJ.

Plus: I am charging \$1.00 per day until my property of RVHK, TMJR.HK, MJHK, and CMHK are returned, for all parties, including the State of WA. For when my property first got taken away tell up to Present date. Alternatively, what the magistrate deem appropriate, reasonable and just.


VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a non-frivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 3/4/, 2016.

Signature of Plaintiff 

Printed Name of Plaintiff Tim J Kittleson Pro-See

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Address _____

Telephone Number _____

E-mail Address _____